



BellSouth Telecommunications, Inc.
333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

joelle.phillips@bellsouth.com

REC'D TN
REGULATORY AUTH.
Joelle J. Phillips
Attorney
*02 JUN 18 PM 1 12
615 214 6311
Fax 615 214 7406
OFFICE OF
EXECUTIVE SECRETARY

June 18, 2002

VIA HAND DELIVERY

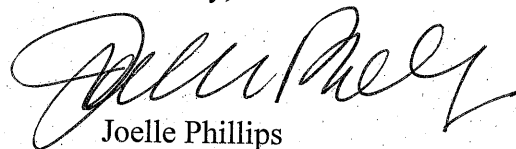
Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: *Petition of Tennessee UNE-P Coalition to Open a Contested Case Proceeding to
Declare Switching an Unrestricted Unbundled Network Element*
Docket No. 02-00207

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of a Joint Motion to Extend the Deadline to Respond to Motions to Compel. Copies of the enclosed are being provided to counsel of record, as well as to third parties.

Cordially,



Joelle Phillips

JP/jej

Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Petition of Tennessee UNE-P Coalition to Open a Contested Case Proceeding to Declare Switching an Unrestricted Unbundled Network Element*

Docket No. 02-00207

JOINT MOTION TO EXTEND THE DEADLINE
TO RESPOND TO MOTIONS TO COMPEL

BellSouth Telecommunications, Inc. ("BellSouth") and the Petitioners in this docket (collectively referred to as the "UNE-P Coalition")¹ file this Joint Motion for an extension of time to respond to motions to compel filed in the above-referenced docket, and respectfully show the Hearing Officer as follows:

Movants have conferred regarding the objections and motions to compel discovery in the above-referenced docket, and Movants are agreeable to extending the time to respond to such motions until Friday, June 21, 2002. This three-day extension will not necessitate the adjustment of any other deadlines currently set in the docket, and Movants believe that the extension of time is necessary in order to allow the parties adequate time to respond to the motions filed in this docket in light of the number of objections raised. An extension will also provide the parties with additional time to confer in an attempt to resolve some of the objections by agreement.

In addition, BellSouth has no objection to extending the period of time to respond to the motions to compel filed by BellSouth regarding its third party discovery. A copy of this motion

¹ The UNE-P Coalition consists of Access Integrated Network, Inc., Birch Telecom of the South, Inc., Ernest Communications, Inc., MCImetro Access Transmission Services, LLC, and MCI WorldCom Communications, Inc. (collectively "WorldCom"), NewSouth Communications Corp., and Z-Tel Communications, Inc.

for extension is being served upon counsel for all third parties, regarding which BellSouth has sought an order compelling discovery in addition to all parties in the docket.

For the foregoing reasons, BellSouth and the UNE-P Coalition respectfully request that the Hearing Officer grant an extension until Friday, June 21, 2002 for all parties and third parties to respond to the motions to compel filed in this docket.

Respectfully submitted,



Guy M. Hicks

Joelle J. Phillips

BELLSOUTH TELECOMMUNICATIONS, INC.

333 Commerce Street, Suite 2101

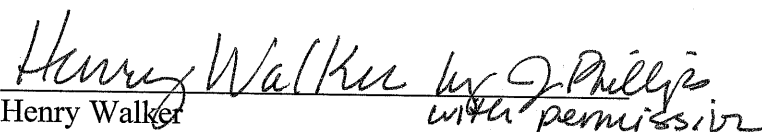
Nashville, Tennessee 37201-3300

(615) 214-6301

Patrick W. Turner

675 W. Peachtree St., NE, Suite 4300

Atlanta, Georgia 30375



Henry Walker

BOULT, CUMMINGS, CONNERS & BERRY

Post Office Box 198062

Nashville, Tennessee 37219-8062

(615) 252-2363

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2002, a copy of the foregoing document was served on counsel for known parties, via the method indicated, addressed as follows:

- ☐ Hand
- ☐ Mail
- ☒ Facsimile
- ☐ Overnight
- ☐ Electronic

Henry Walker, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062
hwalker@boultcummings.com

- ☐ Hand
- ☐ Mail
- ☒ Facsimile
- ☐ Overnight
- ☐ Electronic

Charles B. Welch, Esquire
Farris, Mathews, et al.
618 Church St., #300
Nashville, TN 37219
cwelch@farris-law.com

- ☒ Mail

Andrew O. Isar, Esquire
ASCENT
7901 Skansie Ave., #240
Gig Harbor, WA 98335

- ☐ Hand
- ☐ Mail
- ☒ Facsimile
- ☐ Overnight
- ☐ Electronic

Dana Shaffer, Esquire
Vice President, Regulatory Counsel
XO Communications
105 Molloy Street
Nashville, Tennessee 37201

- ☐ Hand
- ☐ Mail
- ☒ Facsimile
- ☐ Overnight
- ☐ Electronic

Mr. Brent E. McMahan
Vice President - Regulatory &
Governmental Affairs
Network Telephone
815 South Palafox
Pensacola, Florida 32501

- ☐ Hand
- ☐ Mail
- ☒ Facsimile
- ☐ Overnight
- ☐ Electronic

Terry J. Romine
Director, Legal & Regulatory Affairs
Adelphia Business Solutions
1 N. Main Street
Coudersport, Pennsylvania 16915

